

BRUCE A. HARLAND, Bar No. 230477  
WEINBERG, ROGER & ROSENFELD  
A Professional Corporation  
1001 Marina Village Parkway, Suite 200  
Alameda, California 94501  
Telephone (510) 337-1001  
Fax (510) 337-1023  
E-Mail: bharland@unioncounsel.net

Attorneys for Defendant SEIU UNITED HEALTHCARE  
WORKERS-WEST

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

GREG PRICE, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

SEIU UNITED HEALTHCARE WORKERS-  
WEST, and DOES 1 through 10,

Defendants.

No. 1:20-CV-00385-AWI-SKO

**NOTICE OF MOTION AND MOTION  
TO DISMISS**

Date: May 4, 2020  
Time: 1:30 p.m.  
Judge: Hon. Anthony W. Ishii  
Courtroom: 2  
Address: Robert E. Coyle United States  
Courthouse  
2500 Tulare Street, 8th Floor  
Fresno, CA 93721

**TO: ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that on Monday, May 4, 2020, at 1:30 p.m. in Courtroom 2 of the above-entitled Court, located at the 2500 Tulare Street, Eighth Floor, Fresno, CA 93721, Defendant SEIU, United Healthcare Workers–West (“SEIU–UHW” or the “Union”) will move and hereby does move this Court for an Order granting its motion to dismiss Plaintiff's Complaint.

This motion is brought pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure because Plaintiff has failed to state a claim upon which relief can be granted under Rule 12(b)(6).

This motion is based upon this Notice of Motion and Motion; the accompanying

Memorandum of Points and Authorities; the accompanying proposed order; and the complete files and records in this action; and such other argument or evidence as may be presented.

Dated: April 2, 2020

WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

By: /s/ Bruce A. Harland  
BRUCE A. HARLAND

Attorneys for Defendant SEIU UNITED  
HEALTHCARE WORKERS-WEST

148949\1077170